

## **EXHIBIT I**

**Letter from Kathleen R. Hartnett, counsel for  
Oracle, to Eric Vandavelde,  
dated December 19, 2019**



December 19, 2019

VIA EMAIL

Eric D. Vandeveld, Esq.  
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Re: *Oracle USA, Inc. et al. v. Rimini Street, Inc. & Seth Ravin*  
Case No. 2:10-cv-0106-LRH-VCF (D. Nev.)

Dear Eric:

I write in response to your letter dated December 11, 2019, regarding Rimini's questions regarding discovery and damages.

Oracle notes that nothing prevented Rimini from seeking leave of the Court to take discovery, either before or after the Court issued its June 21, 2019 scheduling order. Nor did Rimini seek permission to take discovery after the Court granted in part Oracle's motion to compel or in any of the subsequent status conferences. *See, e.g.*, ECF No. 1255; ECF No. 1278; ECF No. 1289. Rimini also never raised the issue with Oracle, much less any concern during the Parties' negotiations regarding the scheduling order, that Oracle "proposed expert discovery schedules that are too compact to include damages discovery." Dec 11, 2019 letter from E. Vandeveld to K. Hartnett. Oracle does not agree that its rights to seek relief are constrained in any way by Rimini's failure to seek discovery in this post-Injunction phase of this proceeding.

Notwithstanding the above, Oracle response to Rimini's questions as follows:

First, Oracle will produce documents or evidence it intends to rely upon in this contempt proceeding—to the extent they have not previously been produced to Rimini in either *Rimini I* or *Rimini II*—according to the Court-ordered discovery schedule. As noted in Oracle's November 26 correspondence, to the extent Rimini is requesting a preview of Oracle's expert disclosures, Oracle declines to provide such a preview. Nov. 26, 2019 letter from J. Minne to J. Tryck.

Second, Oracle confirms that it is not currently planning to seek damages as part of its Motion for Order to Show Cause. But discovery is not yet closed, and Oracle reserves all rights to seek further remedies, including but not limited to damages, before or after the Court has assessed Rimini's liability for its contumacious conduct.

**BSF**

Mr. Eric Vandeveld  
December 19, 2019  
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Sincerely,

/s/ Kathleen R. Hartnett

Kathleen R. Hartnett

cc: *Rimini I* Distribution List